

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JACK REESE, FRANCES ELAINE PIDDE,
JAMES CICHANOFSKY, ROGER MILLER,
GEORGE NOWLIN and RONALD HITT, on
behalf of themselves and
a similarly situated class,

Hon. Patrick J. Duggan

Case No. 04-70592

Plaintiffs,

v.

Class Action

CNH GLOBAL N.V., formerly
known as Case Corporation,
and CNH AMERICA LLC,

Defendants.

EXHIBIT 1

TO

PLAINTIFFS' SECOND MOTION FOR ATTORNEY FEES

AFFIDAVIT OF ROGER J. McCLOW

May 24, 2011

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JACK REESE, FRANCES ELAINE PIDDE,
JAMES CICHANOFSKY, ROGER MILLER,
GEORGE NOWLIN and RONALD HITT, on
behalf of themselves and
a similarly situated class,

Hon. Patrick J. Duggan

Case No. 04-70592

Plaintiffs,

v.

Class Action

CNH GLOBAL N.V., formerly
known as Case Corporation,
and CNH AMERICA LLC,

Defendants.

Roger J. McClow (P27170)
KLIMIST, McKNIGHT, SALE,
McCLOW & CANZANO, P.C.
Attorneys for Plaintiffs
400 Galleria Officentre, Suite 117
Southfield, MI 48034
(248) 354-9650

Norman C. Ankers (P30533)
HONIGMAN MILLER
SCHWARTZ AND COHN LLP
Attorneys for Defendants
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226
(313) 465-7000

Bobby R. Burchfield, Esq.
McDERMOTT WILL & EMERY
Attorneys for Defendants
600 Thirteenth Street, N.W.
Washington, D.C. 20005
(202) 756-8000

AFFIDAVIT OF ROGER J. McCLOW
IN SUPPORT OF MOTION FOR ATTORNEY FEES

STATE OF MICHIGAN)
)ss
COUNTY OF OAKLAND)

Roger J. McClow, being first duly sworn, states as follows:

1. I am Of Counsel to the law firm of Klimist, McKnight, Sale, McClow & Canzano, P.C., in Southfield, Michigan. I have been associated with the Firm since 1981 and, from 1983 through 2008, I was a partner.

2. I graduated magna cum laude from Wayne State University Law School in Detroit, Michigan in 1976. I have been a member of the Michigan State Bar since May of 1977. I have extensive trial and appellate experience before Michigan courts, federal courts and the National Labor Relations Board. I am admitted to practice before the Fourth, Sixth and Eighth Circuit Courts of Appeals and the United States Supreme Court. I have practiced in federal district courts in Illinois, Indiana, Iowa, Michigan, Minnesota, Missouri, New Jersey (bankruptcy), New York, Ohio, Oklahoma, Pennsylvania, Texas, Virginia and Wisconsin. I am rated AV by Martindale Hubbell and have been listed in Who's Who in American Law since 1994 and in Who's Who in America since 1998.

3. My practice consists primarily of labor law litigation representing unions and employees in the state and federal courts, before administrative agencies and in arbitrations. My practice focuses on federal court litigation.

4. I have been a speaker on labor law topics before the American Bar Association, Michigan's Institute of Continuing Legal Education and the State Bar of Michigan. I am the author of *Labor Law and Unemployment Compensation*, Wayne Law Review, Vol. 35, No. 2 (Winter 1989).

5. I have litigated several complex state and federal court cases involving multiple parties and tens of millions of dollars. I was one of the trial attorneys in the successful age

discrimination action arising out of the closing of NL Industries' Doehler-Jarvis plant in Grand Rapids, Michigan. *See Adama v. Doehler-Jarvis*, 115 Mich. App. 82 (1982), *rev'd* 419 Mich. 905 (1984), *on rem.* 144 Mich. App. 764 (1985), *rem.* 424 Mich. 705 (1986).

6. I represented retirees in enforcing the judgment in the seminal retiree insurance case of *UAW v. Yardman*, 716 F.2d 1476 (6th Cir. 1983). I handled the class action litigation for plaintiffs in the retiree insurance case of *UAW v. Ross Valve* in the Eastern District of Michigan in 1984. I represented retirees of Echlin Inc.'s Owosso plant in a class action retiree health insurance lawsuit, *UAW Local 836 v. Echlin, Inc.*, 670 F. Supp. 697 (E.D. Mich. 1986), which involved approximately 90 retirees.

7. I was Class Counsel in two related retiree health care cases, *Haggerty v. NL Industries*, No. 87-1292 (W.D.N.Y.) and *Farley v. UAW and Paolucci*, No. 90-6195 (E.D. Pa.), in which NL and Farley separately sought declaratory judgments that they were not required to provide lifetime medical benefits for retirees. Those cases were settled in 1992. NL agreed to pay approximately \$2.5 million, or 75% of accrued out of pocket medical claims. NL and Farley both agreed to provide a modified lifetime medical plan for retirees. The combined estimated present value of those plans was in excess of \$80 million. As part of the settlement, Farley placed approximately \$100 million worth of its major asset, Fruit of the Loom stock, in escrow to guarantee payment of benefits it agreed to provide.

8. I was Class Counsel in the salaried retiree health care benefits case, *Colby v. Massey-Ferguson*, 94-71698-DT (E.D. Mich.), which was settled in 1997. In the settlement, Lucas Varity (the successor to Massey-Ferguson, now owned by TRW) agreed to provide lifetime health care benefits to the Class and a Modified Health Care Plan for Pre-1984 Class Members, who comprised a vast majority of the Class. The Modified Plan was a substantial improvement over the plan Massey-Ferguson had implemented in 1994 which had led to the litigation. Lucas Varity also paid

\$2.35 million into a Common Fund for attorney fees and reimbursement of health care expenses incurred by Pre-1984 Class Members.

9. I was Class Counsel for retirees and surviving spouses in *Fox v. Massey-Ferguson*, 172 F.R.D. 653 (E.D. Mich. 1995), *affirmed* 91 F.3d 143 (6th Cir. 1996), an hourly retiree health care case. That case was also settled in 1998 after a trial before Judge Julian Cook. Under the Settlement Agreement, the Company agreed to provide a health care benefit plan for the lives of retirees and surviving spouses with no premium contribution. It also agreed to pay 100% of the out of pocket costs the Class Members incurred until the May 31, 1995 preliminary injunction went into effect.

10. I was Class Counsel for a Class of retirees and surviving spouses in *Golden v. Kelsey-Hayes*, No. 93-CV-40530 (E.D. Mich.), another retiree health care case. Judge Paul V. Gadola initially issued a preliminary injunction, 845 F. Supp. 410 (E.D. Mich. 1994), *aff'd* 73 F.3d 648 (6th Cir. 1996), and subsequently granted plaintiffs' motion for summary judgment. 954 F. Supp. 1173 (E.D. Mich. 1997). The parties then entered into a settlement providing for 100% health care coverage for life and for all damages incurred less \$250.00 per class member.

11. I was class counsel in the retiree health care case of *Gilbert v. Doehler-Jarvis, Inc. and Harvard Industries*, Case No. 3:99 CV 7395 (N.D. Ohio), which involved more than 500 retirees and surviving spouses of retirees, from Doehler-Jarvis' facilities in Ohio and Pennsylvania who retired after Farley sold those facilities in 1990. In *Gilbert*, the court entered summary judgment in favor of the retirees on March 6, 2000, nine days before Doehler-Jarvis intended to terminate the benefits. *Gilbert v. Doehler-Jarvis, Inc.*, 87 F. Supp. 2d 788 (N.D. Ohio 2000). The court entered its final judgment in favor of the retirees on June 28, 2001.

12. I am or have been class counsel for in several other retiree health care actions, including *Brock v. Industrial Metal Products*, Case No. Case No. 1:01-405 (W.D. Mich.); *Hunt v.*

Melling Forging, Case No. 1:99-914 (W.D. Mich.); *Burcicki v. Newcor Tool, Inc.*, Case No. 02-70230 (E.D. Mich.); *La Forest v. Honeywell International, Inc.*, Case No. 03-6248T (W.D.N.Y.); *Vance v. Tenneco Automotive Operating Co.*, Case No. 04-60012 (E.D. Mich.); *Neil v. Raytheon, Inc.*, Case No. 05-2521-B (N.D. Tex.); *Shotwell v. Owens Corning*, Case No. 2:07-13673 (E.D. Mich.); and *Audia v. Newcor, Inc.*, Case No. 10-10209 (E.D. Mich.). Each of these cases were settled. In all but, *Melling Forging*, the settlement included lifetime health care and prescription drug benefits with no premium contribution and damages. In *Melling Forging*, the settlement provided for damages and additional pension and medical expense payments over a ten year period.

13. I am class counsel in the companion case of *Yolton v. El Paso Tennessee Pipeline Company and CNH America LLC*, Case No. 02-75164, currently pending before this Court. On December 31, 2003, this Court issued an Opinion and Order in *Yolton* granting the plaintiffs' motion for a preliminary injunction. *Yolton v. El Paso Tennessee Pipeline Co.*, 318 F. Supp.2d 455 (E.D. Mich. 2003). That decision was affirmed on January 17, 2006 by the Sixth Circuit, at 435 F.3d 571 (6th Cir. 2006). On March 6, 2008, this Court entered summary judgment in favor of Plaintiffs, *Yolton v. El Paso Tennessee Pipeline Co.*, 2008 WL 624038 (E.D. Mich.).

14. Attached to this Affidavit are two Exhibits showing the legal services provided and expenses incurred in this matter. These Exhibits are true and accurate records of my firm's services and expenditures.

Exhibit A is a record of attorney hours from March 4, 2008 through today, May 24, 2011. My time records and the time records of the other attorneys were maintained contemporaneously with the hours worked. I have not included any time Sam McKnight or I spent on the initial attorney fee motion after the revised motion was filed, which includes about 85 hours spent from March 1, 2008 through May 15, 2008 for researching and drafting the revised motion for attorney fees; for reviewing CNH's response to that motion; and for researching and drafting Plaintiffs' reply brief.

Exhibit A includes time beginning in early March 2008 for services performed on the appeal, on remand, on this motion for attorney fees and on other miscellaneous tasks. Of the 877.25 hours shown on my time records, 317.50 hours were spent on the initial appeal; 1.75 have been spent on CNH's current appeal; 499.25 has been spent on matters related to the remand; 41.50 hours has been spent on the current attorney fee motion through today; and 17.25 hours have been spent on miscellaneous matters related to the litigation.

Exhibit B is a summary of the litigation expenses incurred through April 30, 2011 with monthly details for photocopying, electronic court documents and electronic legal research costs. The clerical services represent 23 hours related to the December 2010 mass mailing at \$20.00 per hour. Receipts for most of the other listed expenses (excluding minor cost items like fax, postage and express mail costs) are attached to Exhibit B.

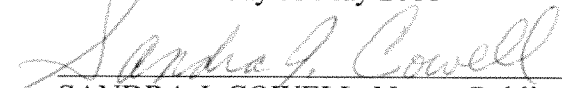
15. The following are the totals from the attached Exhibits:

A. Attorney Hours	Roger J. McClow	877.25 Hrs.
	Samuel C. McKnight	41.75 Hrs.
	Other Partners-- John Canzano	6.25 Hrs.
	Associates	31.00 Hrs.
	Patrick Rorai (PJR) Meagan Dolleris (MBD)	
	Total Attorney Hours	956.25 Hrs.
C. Litigation Expenses		\$ 21,328.73



ROGER J. McCLOW

Subscribed and sworn to before
me this 24th day of May 2011



SANDRA J. COWELL, Notary Public
Wayne County, MI (Acting in Oakland)
My Commission Expires: September 30, 2011

P:\RHC Cases\Case Corp\Case - Reese litigation\Pleadings\atty fee affidavit mcclow second motion 110524.wpd

EXHIBIT A

**Reese v. CNH Global N.V.
Attorney Hours**

**Roger J. McClow
March 2008 through May 24, 2011**

Atty	Date	Description of Services	Hours
RJM	3/4/2008	Research, draft and file Notice of Appeal	1.50
RJM	3/5/2008	Draft transcript order statement	0.50
RJM	3/6/2008	Telephone conference with Rogaczewski	0.25
RJM	3/7/2008	Review Rogaczewski email; email Rogaczewski	0.25
RJM	3/11/2008	Review stipulation; telephone conference with Rogaczewski	0.25
RJM	3/12/2008	Draft Sixth Circuit Mediation statement; review CNH Statement of Parties and Issues	1.00
RJM	3/13/2008	Draft transcript order; research and draft bill of costs; review and revise mediation statement	1.50
RJM	3/14/2008	Revise and file transcript order and mediation conference statement; draft bill of costs and prepare supporting documentation	5.25
RJM	3/17/2008	Telephone conference with Burchfield	0.25
RJM	3/24/2008	Telephone conference with Mary Ann Yevons, Sixth Circuit (2)	1.00
RJM	3/27/2008	Telephone conference with Hecker re post-2004 retirees	0.25
RJM	3/27/2008	Review and record dates in Sixth Circuit scheduling letter	0.25
RJM	4/4/2008	Settlement conference call with Levine, Crider and Yevins; telephone conference with Jim Poplawski	1.75
RJM	4/9/2008	Correspondence with Class Representatives re case status and settlement proposal; correspondence with Poplawski	3.25
RJM	4/16/2008	Draft settlement proposal term sheet; email to Saggau re term sheet; review 9/20/2000 letter of understanding re plan modifications	2.25
RJM	4/21/2008	Correspondence with Levine re settlement proposal	0.25
RJM	4/29/2008	Telephone conference with Ron Hitt	0.25
RJM	4/30/2008	Conference call with Mediation Clerk, Jason Levine and Allan Crider	1.00
RJM	5/6/2008	Review CNH appeal brief	0.50
RJM	5/19/2008	Telephone conference with Maryanne Yevons, Sixth Circuit mediator	0.25
RJM	5/27/2008	Review CNH appeal brief; research and draft response	9.50
RJM	5/28/2008	Research and draft appeal brief	10.25
RJM	5/29/2008	Research and draft appeal brief	2.50
RJM	5/30/2008	Research appeal issues	4.00
RJM	6/2/2008	Research and draft appeal brief	6.50
RJM	6/3/2008	Research, draft and revise appeal brief	9.00
RJM	6/4/2008	Telephone conference with Sixth Circuit Clerk; draft motion for extension of time	1.00
RJM	6/5/2008	Draft, review and revise appeal brief	7.00
RJM	6/6/2008	Draft appeal brief	4.00
RJM	6/9/2008	Research, draft and revise appeal brief	8.00
RJM	6/10/2008	Draft and revise appeal brief	8.00
RJM	6/11/2008	Draft and revise appeal brief	12.00
RJM	6/12/2008	Draft appeal brief	12.50

Reese v. CNH Global N.V.
Attorney Hours

Roger J. McClow
March 2008 through May 24, 2011

RJM	6/13/2008	Organize file	1.25
		Telephone conference with Sixth Circuit clerk; research references to record	1.00
RJM	6/18/2008		
RJM	6/19/2008	Revise appeal brief and joint appendix	1.50
RJM	6/20/2008	Review order granting motion for attorney fees	0.50
		Review Sherrick email; email to Sherrick re attorney fee award (two)	0.50
RJM	6/23/2008		
		Telephone conference with Louise at 6th Circuit re brief	0.25
RJM	7/1/2008	Correspondence with Rogaczewski re appendix	0.25
		Telephone conference with Rogaczewski; review Rogaczewski email; telephone conference with Sherrick	0.50
RJM	7/2/2008		
		Review correspondence from Sixth Circuit; review order on consolidation of appeal	0.25
RJM	7/11/2008		
RJM	7/23/2008	Draft appearance	0.25
		Draft Disclosure Statement; review pleadings re attorney fee/ERISA issue; review CNH statement of issues on appeal; draft Designation of Record on appeal	3.00
RJM	7/27/2008		
		Telephone conference with Louise Schwarber, 6th Circuit Court; revise and file Designation and Disclosure	0.75
RJM	7/28/2008		
		Telephone conference with Levine; telephone conference with Schwarber re reply brief	0.25
RJM	8/1/2008		
		Conference call re Mediation with Burchfield, Crider and Yevin	1.50
RJM	8/11/2008		
		Research re fourth appeal brief	2.00
RJM	8/12/2008		
		Research re fourth appeal brief	0.25
RJM	8/14/2008		
		Research and draft reply brief	5.00
RJM	8/15/2008		
		Research and draft reply brief	6.00
RJM	8/17/2008		
		Research, draft and revise reply brief	7.50
RJM	8/18/2008		
		Finalize appeal briefs	4.00
RJM	8/22/2008		
		Review and finalize appeal briefs	5.25
RJM	8/25/2008		
		Telephone conference with Saggau re CNH complaint	0.25
RJM	9/9/2008		
		Prepare settlement proposal re attorney fees; correspondence with Burchfield	0.50
RJM	9/17/2008		
		Email to Rogaczewski	0.25
RJM	10/21/2008		
		Telephone conference with Jack Reese	0.25
RJM	11/4/2008		
		Telephone conference with Mary Ann Yevins at 6th Circuit re settlement discussions	0.25
RJM	11/6/2008		
		Telephone conference with Burchfield	0.25
RJM	11/12/2008		
		Telephone conference with Yevins	0.25
RJM	11/26/2008		
		Review CNH's motion to enlarge time; email to Levine; review Levine email	0.50
RJM	12/17/2008		
		Research and draft appeal brief	6.00
RJM	12/31/2008		
		Research, draft and revise appeal brief re attorney fees	7.75
RJM	1/2/2009		
		Research, draft and revise appeal brief re attorney fees	6.50
RJM	1/4/2009		
		Research, draft and revise appeal brief re attorney fees	8.00
RJM	1/5/2009		

**Reese v. CNH Global N.V.
Attorney Hours**

**Roger J. McClow
March 2008 through May 24, 2011**

RJM	1/6/2009	Research, draft and revise appeal brief on attorney fees	13.00
RJM	2/5/2009	Telephone conference with Jerry Sievertsen	0.25
RJM	2/24/2009	Prepare for oral argument; review briefs	1.00
RJM	2/25/2009	Prepare for oral argument; research and review case law	3.00
RJM	2/26/2009	Prepare for oral argument; review case law	3.00
RJM	2/27/2009	Telephone conference with Tom Seymour; prepare for oral argument	5.00
RJM	2/28/2009	Research and prepare for oral argument	5.75
RJM	3/1/2009	Prepare for oral argument	6.00
RJM	3/2/2009	Prepare for oral argument; travel to Cincinnati	11.00
RJM	3/3/2009	Prepare for and attend Sixth Circuit oral argument; travel to Detroit	15.00
RJM	3/5/2009	Telephone conference with Dean Prine	0.25
RJM	7/27/2009	Review Sixth Circuit opinion; telephone conference with Saggau; email Saggau; telephone conference with Renate Klass; telephone conference with Stuart Israel; review record; research re petition for rehearing	3.75
RJM	7/28/2009	Telephone conference with Nancy Schiffer; email to Atwood and Hecker	0.50
RJM	7/28/2009	Research re petition for rehearing	1.00
RJM	7/29/2009	Correspondence with Plaintiffs; research re petition for rehearing	5.00
RJM	7/30/2009	Review decision and trial record	1.75
RJM	7/31/2009	Research re petition for rehearing	1.00
RJM	8/3/2009	Telephone conference with Bobby Burchfield; telephone conference with Saggau; email to Saggau; telephone conference with Tom Seymour; research re Petition for Rehearing to Sixth Circuit	8.25
RJM	8/4/2009	Telephone conference with Sanders; telephone conference with Saggau; research re Petition for Rehearing to Sixth Circuit; review documents	4.75
RJM	8/5/2009	Research and draft Petition for Rehearing to Sixth Circuit	7.75
RJM	8/6/2009	Telephone conference with Jack Reese; research and draft Petition for Rehearing to Sixth Circuit	9.00
RJM	8/7/2009	Draft and revise Petition for Rehearing to Sixth Circuit	10.00
RJM	8/9/2009	Draft, review and revise Petition for Rehearing to Sixth Circuit	6.25
RJM	8/10/2009	Telephone conference with clerk; draft, review and revise Petition for Rehearing to Sixth Circuit	8.50
RJM	8/11/2009	Review Rose v Volvo decision; email Stuart Israel; review Sixth Circuit briefs in Rose re new issue addressed on appeal	1.00
RJM	8/13/2009	Telephone conference with Jeff Vasch	0.25
RJM	8/14/2009	Review and organize file; correspondence with Class Plaintiffs re Petition for Rehearing to Sixth Circuit	1.50
RJM	9/17/2009	Telephone conference with Jack Reese	0.25

Reese v. CNH Global N.V.
Attorney Hours

Roger J. McClow
March 2008 through May 24, 2011

RJM	9/24/2009	Review Sixth Circuit decision re Petition for Rehearing	0.75
RJM	9/25/2009	Email Saggau re Petition for Rehearing; review documents re managed care prior to '98 negotiations; review demographics of pre-'98 retirees	3.75
RJM	9/28/2009	Correspondence with Class Representatives re order denying petition for rehearing en banc	0.25
RJM	9/29/2009	Telephone conference with Tom Seymour	0.50
RJM	10/19/2009	Telephone conference with Delores Hanson	0.25
RJM	10/22/2009	Telephone conference with CNH Attorney Burchfield	0.25
RJM	10/27/2009	Review CNH settlement proposal	0.50
RJM	11/2/2009	Review CNH 2005 SPD and documents relating to 2005 negotiations; correspondence to Burchfield re CNH's settlement proposal	6.00
RJM	11/6/2009	Telephone conference with Joe Kiriaki	0.25
RJM	11/12/2009	Telephone conference with Reese	0.25
RJM	11/25/2009	Review Burchfield letter re settlement proposal	0.50
RJM	11/30/2009	Correspondence with Burchfield; correspondence with Class Plaintiffs; correspondence with Saggau	1.25
RJM	12/1/2009	Email to Saggau; review Saggau email	0.25
RJM	12/4/2009	Telephone conference with Jim Cichanofsky	0.25
RJM	12/7/2009	Telephone conference with Saggau; email to Saggau	0.25
RJM	12/9/2009	Telephone conference with Chuck Shanks (2); telephone conference with Jack Reese; telephone conference with Nowlin; correspondence with Burchfield	2.50
RJM	12/10/2009	Review 6th Circuit decision; review Company correspondence; work on response to Company re settlement	1.75
RJM	12/15/2009	Review settlement proposal; work on Reply to CNH	0.75
RJM	12/15/2009	Draft settlement proposal; correspondence with Burchfield	1.50
RJM	12/16/2009	Revise letter to Burchfield re settlement	0.25
RJM	12/21/2009	Research re managed care plans	1.00
RJM	12/23/2009	Correspondence with George Nowlin; correspondence with Class Plaintiffs	0.75
RJM	12/29/2009	Telephone conference with Roger Miller	0.25
RJM	1/4/2010	Research re managed care; draft memo re issues on remand	1.50
RJM	1/5/2010	Telephone conference with James Andrews	0.25
RJM	1/19/2010	Telephone conference with Nickelhoff re Reese decision	0.50
RJM	3/2/2010	Telephone conference with Saggau	0.25
RJM	3/4/2010	Review UAW Motion to Quash; telephone conference with Saggau; review 1995 and 1998 negotiations re managed care issues	2.25
RJM	3/5/2010	Review documents re 1995 negotiations	0.75
RJM	3/9/2010	Review documents re managed care negotiations	3.25
RJM	3/10/2010	Review documents re managed care; review CNH pleadings and Notice of Hearing; review court rules re Reply Brief	3.75

Reese v. CNH Global N.V.
Attorney Hours

Roger J. McClow
March 2008 through May 24, 2011

RJM	3/15/2010	Telephone conference with Mike Saggau; review documents re managed care	0.75
RJM	3/16/2010	Review response to Motion for Protective Order	0.50
RJM	3/17/2010	Telephone conference with Rogaczewski	0.25
RJM	3/18/2010	Review Saggau email; email Saggau; telephone conference with Saggau; review Saggau memo re meaning of Reese decision	1.00
RJM	3/19/2010	Telephone conference with Saggau; review Saggau email; review CNH response to Motion for Protective Order; research and draft Reply in Support of Motion for Protective Order	4.00
RJM	3/22/2010	Draft and revise Reply Brief; emails to and from Saggau	7.75
RJM	3/24/2010	Telephone conference with Saggau	0.25
RJM	3/25/2010	Telephone conference with Saggau	0.25
RJM	3/26/2010	Telephone conference with Saggau	0.25
RJM	4/13/2010	Emails with Rogaczewski re hearing	0.25
RJM	4/19/2010	Telephone conference with Hecker (2); conference with Retirees; telephone conference with Saggau; prepare for and attend hearing on Motion for Protective Order	5.50
RJM	4/20/2010	Review Saggau email; email Saggau	0.25
RJM	4/23/2010	Telephone conference with Saggau	0.25
RJM	4/27/2010	Review documents re managed care negotiations	1.50
RJM	4/28/2010	Review documents and Atwoods depositions; draft Atwood Declaration	3.75
RJM	4/29/2010	Review depositions re 1998 negotiations; organize file	1.00
RJM	4/30/2010	Telephone conference with Joe Kiriaki	0.50
RJM	5/3/2010	Review 1990, 1995 and 1998 health care plans and negotiation documents	3.75
RJM	5/4/2010	Telephone conference with Saggau; review Williams deposition; review plan provisions; draft Williams/Reese Declaration; email to Saggau	4.25
RJM	5/5/2010	Review documents; draft Williams/Reese Declaration	5.00
RJM	5/6/2010	Review documents re 1998 negotiations; draft and revise Williams/Reese Declaration	6.50
RJM	5/7/2010	Review documents; summarize documents re Motion for Summary Judgment; draft Williams/Reese Declaration	5.50
RJM	5/10/2010	Review documents re 1995, 1998, 2004-05 and 2010 negotiations	6.25
RJM	5/11/2010	Work on Motion for Summary Judgment; review and summarize documents	7.00
RJM	5/12/2010	Review and summarize documents re managed care; work on Motion for Summary Judgment	5.25
RJM	5/13/2010	Review and summarize documents re 1998 negotiations	5.75
RJM	5/14/2010	Review documents re 1998 negotiations for Motion for Summary Judgment	6.75

**Reese v. CNH Global N.V.
Attorney Hours**

**Roger J. McClow
March 2008 through May 24, 2011**

RJM	5/17/2010	Review and summarize documents re 1998 negotiations	2.00
RJM	5/18/2010	Review documents re 1998 negotiations	0.50
RJM	5/20/2010	Review letter from Rogaczewski; email to and from Saggau; review depositions re Ag Imp department	1.00
RJM	5/25/2010	Review and summarize documents re 1998 negotiations; prepare Motion for Summary Judgment	3.25
RJM	5/28/2010	Telephone conference with Saggau	0.25
RJM	6/2/2010	Research and draft Motion for Summary Judgment; review and summarize documents relating to 1998 negotiations	5.00
RJM	6/3/2010	Review documents re indemnity plan and East Moline Plant Shutdown Agreement; draft Motion for Summary Judgment	6.75
RJM	6/4/2010	Research and draft Motion for Summary Judgment	6.25
RJM	6/7/2010	Draft Motion for Summary Judgment	5.75
RJM	6/8/2010	Draft and revise Motion for Summary Judgment; telephone conference with Tom Seymour	4.50
RJM	6/9/2010	Organize file; review documents and draft Motion for Summary Judgment; review email from Seymour; email Seymour	5.75
RJM	6/10/2010	Research and draft Motion for Summary Judgment	6.00
RJM	6/11/2010	Review and summarize documents re 1998 negotiations; draft Motion for Summary Judgment	7.75
RJM	6/14/2010	Research and draft Motion for Summary Judgment	6.50
RJM	6/15/2010	Research and draft Brief	3.00
RJM	6/16/2010	Review and summarize documents; draft and revise Motion for Summary Judgment	6.25
RJM	6/17/2010	Draft Motion for Summary Judgment; review and summarize documents	1.50
RJM	6/22/2010	Research and draft Motion for Summary Judgment; review documents	7.00
RJM	6/23/2010	Review documents; summarize documents; draft Motion for Summary Judgment	6.00
RJM	6/24/2010	Draft and revise Motion for Summary Judgment; review documents	6.75
RJM	6/25/2010	Telephone conferences (2) with Jack Reese; review and prepare exhibits for Motion for Summary Judgment	3.25
RJM	6/26/2010	Review documents re exhibits for Motion for Summary Judgment	2.00
RJM	6/28/2010	Review and summarize documents re 1998 negotiations; draft Motion for Summary Judgment; review documents from Reese	7.75
RJM	6/29/2010	Draft and revise Motion for Summary Judgment	5.00
RJM	6/30/2010	Telephone conference with Rogaczewski; telephone conference with Saggau; draft Motion for Summary Judgment	4.25

Reese v. CNH Global N.V.
Attorney Hours

Roger J. McClow
March 2008 through May 24, 2011

RJM	7/1/2010	Review CNH's Motion for approval of plan changes; draft Motion for Summary Judgment; telephone conference with Rogaczewski; email Saggau	7.25
RJM	7/2/2010	Draft and revise Motion for Summary Judgment; draft Motion for Summary Judgment re East Moline Shutdown Agreement; email to Saggau re motions	6.50
RJM	7/6/2010	Review Rogaczewski letter; review documents re Motion for Summary Judgment; draft Reese Declaration; revise Williams Declaration	6.50
RJM	7/7/2010	Telephone conference with Jack Reese; review documents re 1998 negotiations; draft Reese Declaration	6.75
RJM	7/8/2010	Review documents; draft and revise Motion for Summary Judgment; draft and revise Reese Declaration	7.25
RJM	7/9/2010	Draft Motion and Reese Declaration; review documents; conference with Jack Reese	7.50
RJM	7/11/2010	Draft and revise Reese Declaration; organize exhibits; revise Motion for Summary Judgment	3.25
RJM	7/12/2010	Telephone conference with Tom Seymour; telephone conferences (2) with Saggau; revise Reese Declaration; organize documents; revise Motion for Summary Judgment	8.25
RJM	7/13/2010	Revise Reese Declaration; revise Motions; organize exhibits; email to Saggau; review Saggau email	9.00
RJM	7/16/2010	Draft and revise Motion to Modify; draft Motion to File Second Brief	9.50
RJM	7/19/2010	Telephone conference with Rogaczewski; finalize Motion to File Second Brief; review CNH Motion to Modify; review documents re response	9.00
RJM	7/20/2010	Telephone conference with Saggau; review CNH Motion to Modify and Macey Declaration; research re expert witness declarations; draft response	5.00
RJM	7/21/2010	Revise Stipulated Order; email from and to Rogaczewski; research and draft Response to CNH Motion to Modify	7.25
RJM	7/22/2010	Research and draft Response Brief; conference with Brian Logue; telephone conference with Ceccotti	8.50
RJM	7/23/2010	Telephone conference with Tom Seymour; research and draft Response; conference with Brian Logue	7.75
RJM	7/24/2010	Draft Response to CNH Motion to Modify	2.75
RJM	7/25/2010	Research and draft Response to CNH Motion to Modify	8.00
RJM	7/26/2010	Research, draft and revise Response Brief	15.25
RJM	7/28/2010	Correspondence with Class Representatives re status of case	1.00
RJM	8/5/2010	Draft Reply re Motion for Leave; telephone conference with Rogaczewski	1.75

Reese v. CNH Global N.V.
Attorney Hours

Roger J. McClow
March 2008 through May 24, 2011

RJM	8/9/2010	Telephone conference with Nicholson; review CNH's Motion for Summary Judgment and Response to Plaintiffs' Motion for Summary Judgment	0.50
RJM	8/10/2010	Review exhibits to CNH Motion for Summary Judgment	0.50
RJM	8/16/2010	Telephone conference with Saggau	0.25
RJM	8/23/2010	Review CNH Brief; research re response; email to Rogaczewski	1.50
RJM	8/27/2010	Research re function of appellate courts	1.75
RJM	8/30/2010	Review CNH Motion for Summary Judgment; research law; draft response	6.00
RJM	8/31/2010	Research and draft Response to Motion for Summary Judgment	8.00
RJM	9/1/2010	Research and draft response and Reply Brief	8.50
RJM	9/2/2010	Draft and revise Brief; email Saggau; telephone conference with Saggau	14.25
RJM	9/3/2010	Review East Moline shutdown agreement; draft and revise Motion for Summary Judgment	2.50
RJM	9/7/2010	Review and revise Motion and Brief re EastMoline shutdown agreement	4.00
RJM	9/10/2010	Review email from Saggau; email Saggau re status	0.25
RJM	9/13/2010	Telephone conference with Tom Seymour	0.25
RJM	9/15/2010	Email to Locals 180 and 807 re status of case	0.50
RJM	9/27/2010	Telephone conference with Joshua Rogaczewski	0.25
RJM	9/29/2010	Email from Rogaczewski re stipulation; review stipulation; email to Rogaczewski	0.25
RJM	10/18/2010	Telephone conference with Rogaczewski (2);review CNH Motion for Summary Judgment and Brief	1.50
RJM	10/19/2010	Draft Reply Brief re East Moline Plant Shutdown agreement	2.50
RJM	10/20/2010	Draft and research Reply Brief	2.75
RJM	10/24/2010	Research re law of the case	1.75
RJM	10/25/2010	Research and Draft Reply in support of Motion for Summary Judgment	10.00
RJM	11/19/2010	Telephone conference with Paul Vieau	0.25
RJM	11/29/2010	Telephone conference with Kevin Wiens	0.25
RJM	12/3/2010	Telephone conference with CNH attorney Rogaczewski	0.25
RJM	12/13/2010	Telephone conference with Tom Seymour	0.25
RJM	12/23/2010	Revise status letter to class members; prepare mailing	1.25
RJM	12/27/2010	Oversee mailing of status letter; organize files	1.75
RJM	12/28/2010	Oversee mailing to class members re status	0.50
RJM	12/30/2010	Telephone conference with Bettie Bonds	0.25
RJM	1/3/2011	Telephone conference with Frank Phillips	0.25
RJM	1/4/2011	Telephone conference with Luke Kozich; telephone conference with Paul View	0.50
RJM	1/5/2011	Review returns from mailing; email to Kevin M and Dick Sanders; telephone conference with Valko	0.75

**Reese v. CNH Global N.V.
Attorney Hours**

**Roger J. McClow
March 2008 through May 24, 2011**

RJM	1/7/2011	Telephone conference with Frank When	0.25
RJM	1/11/2011	Review returned letters; input information into database	0.25
RJM	1/13/2011	Prepare for hearing	4.00
RJM	1/14/2011	Prepare for oral argument	3.25
RJM	1/15/2011	Prepare for oral argument	4.00
RJM	1/16/2011	Prepare for oral argument	6.25
RJM	1/17/2011	Prepare for oral argument; research; review documents and pleadings; draft oral argument	6.75
RJM	1/18/2011	Telephone conference with Geib; prepare for and attend oral argument on summary judgment motions	7.75
RJM	1/19/2011	Email to Geib	0.25
RJM	1/21/2011	Telephone conference with Paul View	0.25
RJM	1/24/2011	Review CNH's supplemental authorities; telephone conference with Saggau	0.50
RJM	1/26/2011	Draft and revise response to CNH's Notice of Supplemental Authorities; telephone conference with Saggau (2); review Saggau email	4.50
	2/3/2011	Organize files	1.25
	2/4/2011	Review CNH's post hearing reply brief	0.50
	2/7/2011	Research and draft surreply brief	7.00
	2/8/2011	Research and draft surreply brief	6.00
	2/23/2011	Emails to and from Jeff Vasch and Kevin M., Local 180	0.50
	2/24/2011	Telephone conference with Tom Seymour	0.25
RJM	3/3/2011	Review Judge Duggan's Decision	0.50
RJM	3/4/2011	Review decision; telephone conference with Mike Saggau; telephone conference with Jack Reese; email Reese; review attorney hours since appeal	1.75
RJM	3/7/2011	Telephone conference with Dick Sanders; correspondence with class representatives; email decision to retiree health care attorneys; telephone conference with BNA reporter; research attorney fee issue	1.75
RJM	3/8/2011	Research attorney fees issues	0.25
RJM	3/9/2011	Telephone conference with Jeff Vasch and Kevin M., Local 180	0.25
RJM	3/10/2011	Research and draft motion for attorney fees; correspondence with Donna Euben of LCC re Reese decision	7.50
RJM	3/11/2011	Draft motion for attorney fees; correspondence with UAW President Bob King and Secretary Treasurer Dennis Williams	5.25
RJM	3/14/2011	Work on motion for attorney fees; draft report on Judge Duggan's decision for Local Unions	7.50
RJM	3/15/2011	Draft and revise Motion for Attorney Fees; draft proposed judgment; email to Rogaczewski (2)	5.25
RJM	3/16/2011	Review pleadings re Final Judgment; email to Rogaczewski	1.25
RJM	3/23/2011	Email Rogaczewski re bond and judgment	0.25

Reese v. CNH Global N.V.
Attorney Hours

Roger J. McClow
March 2008 through May 24, 2011

RJM	3/29/2011	Telephone conference with Mary Ann Yevens from Sixth Circuit Court of Appeals	0.50
RJM	4/5/2011	Telephone conference with Joshua Rogaczewski; draft and file Appearance and Corporate Disclosure	1.00
RJM	4/6/2011	Review and docket appellate briefing schedule	0.25
RJM	4/9/2011	Draft and file response to motion for supersedeas bond	1.00
RJM	4/13/2011	Telephone conference with J. Rogaczewski	0.25
RJM	4/15/2011	Email to Rogaczewski; telephone conference with Tom Seymour	0.50
RJM	4/18/2011	Organize file re attorney fees	0.50
RJM	4/20/2011	Work on attorney fee issues	0.50
RJM	4/21/2011	Review supersedeas bond	0.25
RJM	4/28/2011	Telephone conference with Rogaczewski re entry of final judgment	0.25
RJM	5/10/2011	Telephone conference with Rogaczewski and Marilyn, Judge Duggan's clerk; review judgment	0.50
RJM	5/13/2011	Draft and revise motion for attorney fees	2.00
RJM	5/23/2011	Draft and revise motion for attorney fees	8.50
RJM	5/24/2011	Draft and revise motion for attorney fees; draft attorney fee affidavit and exhibits	7.50
		Totals	877.25

**Reese v. CNH Global N.V.
Attorney Hours**

**Samuel C. McKnight
March 2008 through May 24, 2011**

Atty	Date	Description	Hours
SCM	8/8/2008	Review file; several telephone conferences with Case attorneys re brief schedule and mediation; telephone conference with the Court	1.50
SCM	8/14/2008	Review file re various issues on appeal	0.50
SCM	7/29/2009	Review decision and research	1.50
SCM	8/10/2009	Work on Petition for Rehearing to Sixth Circuit	4.00
SCM	12/10/2009	Review 6th Circuit decision; review Company correspondence; work on response to Company re settlement	1.75
SCM	12/15/2009	Review settlement proposal; work on Reply to CNH	0.75
SCM	3/19/2010	Review pleadings re Discovery issues; work on Reply Brief re Motion for Protective Order and CNH Motion to Compel	2.25
SCM	3/22/2010	Work on Reply Brief re Motion for Protective Order and Discovery	1.50
SCM	7/7/2010	Work on CNH Motion to Modify and Union Motion for Summary Judgment	0.50
SCM	7/8/2010	Review CNH Motion for modifications	0.50
SCM	7/14/2010	Work on Motion for Summary Judgment	0.75
SCM	7/16/2010	Work on Motion for Summary Judgment	3.00
SCM	7/19/2010	Work on response to CNH Motion to Modify; telephone conference with consultant/expert	2.00
SCM	7/20/2010	Work on Response Brief re modifications	1.50
SCM	7/21/2010	Telephone conferences (several) with Brian Logue, expert; review CNH Motion	2.00
SCM	7/22/2010	Conference with Brian Logue; work on Response to CNH Motion to Modify	3.00
SCM	7/23/2010	Work on Response; conference with Brian Logue; work on Declaration	4.00
SCM	7/25/2010	Work on Response to CNH Motion	0.75
SCM	7/26/2010	Work on Response to CNH Motion	4.00
SCM	1/13/2011	Review Briefs and prepare for oral argument	1.00
SCM	1/14/2011	Review Briefs and work on argument re summary judgment	2.50
SCM	1/26/2011	Work on Reply Brief	0.50
SCM	2/6/2011	Review CNH Post-Hearing Brief	1.00
SCM	2/7/2011	Work on Sur-Reply Brief	1.00
		Total	41.75

**Reese v. CNH Global N.V.
Attorney Hours**

**John Canzano, Partner
March 2008 through May 24, 2011**

Atty	Date	Description of Services	Hours
JRC	7/2/2010	Review Summary Judgment Brief	0.75
JRC	7/6/2010	Review and suggest revisions to SJ Brief	2.50
JRC	1/18/2011	Attend oral argument with McClow	3.00
		Total	6.25

Reese v. CNH Global N.V.
Attorney Hours

Associates

March 2008 though May 24, 2011

Atty	Date	Description of Services	Hours
PJR	6/2/2008	Review pleadings in preparation for drafting Plaintiff's' response to Defendant's appeal; conference with McClow re: Defendant's arguments on appeal and issues raised before lower court	2.00
PJR	6/3/2008	Review Defendant's motion for summary judgment to identify arguments made in its appeal brief; conference with McClow re: same	1.00
MBD	1/4/2010	Research law review articles re managed care	0.25
MBD	3/16/2010	Draft memo re reopening Discovery and procedure Sixth Circuit uses for publishing decisions	3.00
MBD	4/28/2010	Review all deposition transcripts given by Atwood for reference to the 1998 negotiations	2.50
MBD	5/14/2010	Conference with RJM re assignment	0.25
MBD	5/17/2010	Conference with RJM re file and case	0.75
MBD	5/19/2010	Review file; draft memo re chronology of bargaining	1.75
MBD	5/20/2010	Review deposition excerpts; email Mike Saggau deposition excerpts	0.50
MBD	5/21/2010	Draft, review and revise memo re chronology of 1998 negotiations	3.50
MBD	5/26/2010	Draft, review and revise memo re chronology of 1998 negotiations	1.25
MBD	5/27/2010	Draft, review and revise memo re chronology of 1998 negotiations	2.00
MBD	5/28/2010	Draft, review and revise memo re chronology of 1998 negotiations	1.75
MBD	6/7/2010	Draft, review and revise memo re chronology of 1998 negotiations	2.00
MBD	6/14/2010	Draft, review and revise memo re chronology of 1998 negotiations	3.50
MBD	6/28/2010	Draft, review and revise memo re chronology of 1998 negotiations	0.50
MBD	7/2/2010	Review Motion for Summary Judgment	1.00
MBD	7/13/2010	Review Motion for Summary Judgment re East Moline Shutdown Agreement	0.50
MBD	2/8/2011	Review Sur Reply Brief	0.50
MBD	3/7/2011	Research re attorney fee issues	2.50
		Total	31.00

EXHIBIT B

Reese v. CNH Global N.V.

Summary of Litigation Expenses

3/1/08 through 4/30/2011

Photocopies @\$.15/page	\$ 2,345.55
Fax @\$.25/page	\$ 7.50
Postage	\$ 185.60
Electronic Ct. Documents	\$ 348.16
Legal Research (Westlaw)	\$ 11,879.96
Express Mail	\$ 26.23
Local Travel (Mileage, Parking, etc.)	\$ 66.87
Travel Expenses (Airfare, Hotel, etc.)	\$ 1,198.34
Filing Fee for Cross Appeal	\$ 455.00
Books, Resources	\$ 44.68
Consulting Services (Brian Logue)	\$ 3,054.00
Mass Mailing	\$ 1,256.84
Clerical Services	\$ 460.00

Total Costs \$ 21,328.73

Reese v. CNH Global N.V.

Electronic Research Costs
3/1/08 through 4/30/2011

Month	Cost
Mar-08	\$ 295.27
Apr-08	\$ 290.53
Jun-08	\$ 2,450.61
Jul-08	\$ 368.67
Aug-08	\$ 23.35
Sep-08	\$ 935.46
Nov-08	\$ 107.76
Feb-09	\$ 997.01
Mar-09	\$ 259.77
Apr-09	\$ 630.57
Aug-09	\$ 47.05
Sep-09	\$ 1,317.25
Mar-10	\$ 428.50
Apr-10	\$ 88.58
Jul-10	\$ 220.11
Aug-10	\$ 1,001.46
Sep-10	\$ 310.02
Oct-10	\$ 206.39
Dec-10	\$ 217.71
Feb-11	\$ 662.41
Mar-11	\$ 627.31
Apr-11	\$ 394.17
Totals	\$ 11,879.96

Reese v. CNH Global N.V.*Photocopying Costs***3/1/08 through 4/30/2011**

Month	Number	Cost
Apr-08	198 \$	29.70
May-08	196 \$	29.40
Jun-08	768 \$	115.20
Aug-08	1801 \$	270.15
Jan-09	82 \$	12.30
Feb-09	202 \$	30.30
Mar-09	263 \$	39.45
Jul-09	148 \$	22.20
Aug-09	290 \$	43.50
Sep-09	79 \$	11.85
Nov-09	936 \$	140.40
Mar-10	140 \$	21.00
Apr-10	22 \$	3.30
May-10	40 \$	6.00
Jun-10	451 \$	67.65
Jul-10	3811 \$	571.65
Oct-10	35 \$	5.25
Dec-10	2402 \$	360.30
Jan-11	3475 \$	521.25
Mar-11	94 \$	14.10
Apr-11	204 \$	30.60
Totals	15637 \$	2,345.55

Reese v. CNH Global N.V.

Electronic Court Document Expenses
3/1/08 through 4/30/2011

Month	Cost
Apr-08	\$ 43.44
Jul-08	\$ 10.24
Sep-08	\$ 11.04
Jan-09	\$ 2.56
Apr-09	\$ 27.84
Sep-09	\$ 147.60
Sep-10	\$ 98.00
Dec-10	\$ 2.80
Mar-11	\$ 4.64
Totals	\$ 348.16

Cincinnati, OH



Booked items

Although this itinerary doesn't qualify for ThankYou Points, you can still earn points if you add a hotel booking today or any time before you travel.



Learn more about how to earn points for future bookings.

Flight: Detroit to Cincinnati

[back to top](#)

Expedia itinerary number: **126647610604**
 Airline ticket number(s): Check back in 24 hours

Main contact: Roger J McClow
 E-mail: smcclow@comcast.net
 Home phone: (248) 8518750
 Work phone: (248) 3549650

Traveler and cost summary

Roger McClow	Adult	Requested: Pure Vegetarian Northwest #371906802	\$774.00
			Taxes & Fees \$21.20
			Booking Fee \$7.00
Total (MasterCard)			\$802.20

[Change this flight](#) [View cancellation information](#)

Flight summary

Please be sure to re-confirm your flight at least 24 hours prior to scheduled departure (72 hours prior for flights to Hawaii and international destinations). You may check your flight status and departure gate online, or contact the airline directly. Seat assignments, meal preferences, and special requests must be confirmed with the airline; we cannot guarantee that they will be honored. Free and special meals are not available on many flights.

Mon 2-Mar-09

Detroit (DTW)	to Cincinnati (CVG)	239 mi	Flight: 4622 Operated by: COMAIR INC
Depart 5:00 pm	Arrive 6:15 pm	(385 km)	
Terminal E.M.	Terminal 3	Duration: 1hr 15mn	
MCNAMARA TERMINAL			

Economy/Coach Class (05C), Canadair RJ

Please check in with **Comair**. If checking in at a kiosk, use your name rather than confirmation number.

Total distance: 239 mi (385 km)

Total duration: 1hr 15mn

Tue 3-Mar-09

Cincinnati (CVG)	to Detroit (DTW)	239 mi	Flight: 4600 Operated by: COMAIR INC
Depart 6:55 pm	Arrive 8:12 pm	(385 km)	
Terminal 3	Terminal E.M.	Duration: 1hr 17mn	
MCNAMARA TERMINAL			

Economy/Coach Class (10C), Canadair RJ

Please check in with **Comair**. If checking in at a kiosk, use your name rather than confirmation number.

Total distance: 239 mi (385 km)

Total duration: 1hr 17mn

Airline rules & regulations

- Tickets are nonrefundable. A fee of \$150.00 per ticket will be charged for itinerary changes after the tickets are issued, provided that the booking rules were followed.
- In addition to any penalties imposed by the airline, a processing fee of up to \$30.00 **per ticket** will be charged by Expedia for any changes you make to the flights in this itinerary.
- Tickets are nontransferable and name changes are not allowed.
- This price includes a nonrefundable \$7.00 booking fee.

COST VOUCHER

© ROSEMONT FORMS, INC., P.O. BOX 202, PETERSBURG, PA 16669

Client Wm Rose File # CC

☐ Office Expense

Check One

☐ Phone Call: Person _____ Area _____ No. _____

☐ Notary Fee _____

☐ Postage City _____

☐ Petty Cash _____

☐ Photo Copy: Number _____

Date 3-2-09 Amount \$ 802.20

Explanation
Expedia - NWA Airfare to Cincinnati for hearing

By RAM

COST VOUCHER * ROSEMONT FORMS, INC. P.O. BOX 262, PETERSBURG, PA 16669

Client NAI Person File # 15861
☐ Office Expense dated 7/10

Check One
☐ Phone Call: Person _____ Area _____ No. _____
☐ Notary Fee _____
☐ Postage City _____
☐ Petty Cash _____
☐ Photo Copy: Number _____ \$1000 Park

Date 7/19/10 Amount \$ 30.00
 Explanation parking & fed court 40 miles
 By BSM

549 W. LAFAYETTE
 241 BAGLEY
 238 W. ADAMS
 536 E. CONGRESS
 414 E. CONGRESS
 2456 SECOND ST.
 401 GRAND RIVER
 514-527-540 E. LARNED
 411 E. FORT ST.
 400 & 411 E. LARNED
 440 E. LARNED

CLAIM 036-032
CHECK

APG PARKING, INC.
 Phone 496-0460
 PARKING HOURS AS POST
 NO ATTENDANT AFTER PARKING HO

LIABILITY
 The parking facility only provides a parking space. The parking facility does not provide attending for your vehicle or its contents. We will not be responsible if your car is stolen, damaged, or if property is taken from your vehicle. The "ticket" you received is not a receipt for your vehicle, but a method for calculating your parking charge. The attendants are present solely to collect money and are unable to verify ownership of the vehicles occupying the parking facility. If you do not agree with these terms, you may leave the parking facility now at no charge.

Toledo Ticket Co., Toledo, OH

MCCLOW, ROGER

932/K1S
3/2/2009 7:22:00PM
3/3/2009 1:06:00PM

1/0

RATE PLAN L-AD
HH#
AL:
CAR:

CONFIRMATION NUMBER : 3342010159

3/3/2009 PAGE 1

3/2/2009	3521480	*ROOM SERVICE	\$40.00
3/3/2009	3522294	INTERNET ACCESS	\$9.95
3/3/2009	3522297	MC *9025	(\$49.95)
** BALANCE **			\$0.00

EXPENSE REPORT SUMMARY

	09 00:00:00	12:00:00AM	STAY TOTAL
TELEPHONE	\$0.00	\$9.95	\$9.95
FOOD & BEVERAGE	\$40.00	\$0.00	\$40.00
DAILY TOTAL	\$40.00	\$9.95	\$49.95

COST VOUCHER

© ROSEMONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 16669

Client UAW/Reese File # 22☐ Office Expense

Check One

☐ Phone Call: Person _____ Area _____ No. _____☐ Notary Fee☐ Postage City _____☐ Petty Cash☐ Photo Copy: Number _____

3:01:00AM 668601 A

Date 3-2-3-3-09 Amount \$ 49.95Explanation misc hotel costsfood + telephoneBy Ram

-49.95

Cincinnati, OH (2)



Booked items

The travel dates have passed; the ThankYou Network information on the itinerary cannot be updated.

Earn ThankYou Points on future bookings — learn more.



Hotel: Cincinnati

[back to top](#)

Expedia itinerary number: 126674799390

Main contact: Roger J McClow
E-mail: smcclow@comcast.net
Home phone: (248) 8518750
Work phone: (248) 3549650

Traveler and cost summary

Expedia Special Rate

Reserved for: Roger McClow	Hotel: 1 adult	Standard room	3/2: \$189.00 per night
		Taxes & service fees	\$36.92 per night
		Amount charged for hotel reservation	\$225.92

Room options / Additional requests

We will forward your requests to the property, but we cannot guarantee that your requests will be honored.

1 QUEEN BED, Non-Smoking

Hotel summary

Mon Mar-2-2009 (1night)

Hilton Cincinnati Netherland Plaza

35 W 5th St
Cincinnati, OH 45202
USA

Check in: Mon Mar-2-2009
Check out: Tue Mar-3-2009



Reservation questions: +1 (800) EXPEDIA

For other information contact the hotel: Tel: 1 (513) 421-9100 Fax: 1 (513) 421-4291

Star Rating: ★★★★★ [More lodging info](#)

Unless specified otherwise, rates are quoted in US dollars.

The price shown above DOES NOT include any applicable hotel: minibar snacks or telephone calls), or regulatory surcharges. The surcharges upon check-out.

Your room is guaranteed for late arrival.

Award points and airline mileage may not be awarded when book

Hotel rules and restrictions

Property policies

- You must be at least 21 to check in to this hotel.
- Base rate is for 2 guests.

Guest charges and room capacity

- Total maximum number of guests per room/unit is 4.
- Maximum number of adults per room/unit is 4.
- Maximum number of children per room/unit is 3.
- Maximum number of infants per room/unit is 3.
- This property considers guests aged 17 and under, at tir
- Availability of accommodation in the same property for e;
- The fee for extra adults is \$10.00 per person.

- Your credit card is charged the total cost above at time of purchase. Prices and room availability are not guaranteed until full payment is received.

COST VOUCHER

© ROSEMONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 10

Client WAW/Reese File # CC
☐ Office Expense
 Check One
☐ Phone Call: Person _____ Area _____ No. _____
☐ Notary Fee City _____
☐ Postage
☐ Petty Cash
☐ Photo Copy: Number _____

Date 3.3.09 Amount \$ 225.92
 Explanation Expedia - Hilton Hotel Cincinnati

By Rmw

COST VOUCHER © ROSEMONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 16669

Client W.A. J. Reese File # CC

☐ Office Expense

Check One

☐ Phone Call: Person _____ Area _____ No. _____

☐ Notary Fee City _____

☐ Postage

☐ Petty Cash

☐ Photo Copy: Number _____

Date 3-3-09 Amount \$ 3.32

Explanation Coffee - airport no receipt

Credit card

By RJM

CC ST VOUCHER

© ROSEMONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 16609

Client AW Zeese File # CL
☐ Office Expense
 Check On
☐ Phone Call: Person _____ Area _____ No. _____
☐ Notary Fee
☐ Postage City _____
☐ Petty Cash
☐ Photo Copy: Number _____

Date 3-3-09Amount \$ 9.65

Explanation

misc @ airportBy RSM

Paradies Airport Shops - Cincinnati
 A kiosk 0128
 Cincinnati / N. Kentucky Intl. Airport
 Hebron, KY
 859 767 5722

NEW YORKER 47299206001
 4 99 tt
 V8 ORIGINAL 95648589000
 1.74 N
 DANNON MIXED BRY YOG 11592464000
 1.53 tt
 PL NUTS & RAISINS 04290795000
 1 00 N

SUBTOTAL \$9.26
 TAX \$0.09
 TAX \$0.30
 TOTAL \$9.65
 MASTERCARD \$9.65
 AUTH# (MANUAL) 1234

ITEMS 4 B. JASON
 03/03/2009 06:09PM 0128 01 17429 1613

Thank You for Shopping at
 The Paradies Shops
 Cincinnati / N. Kentucky Intl. Airport
 www.theparadiesshops.com

COST VOUCHER

JOSEPH MONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 16669

Client W. A. R. R. R. File # 148-4

☐ Office Expense

Check One

☐ Phone Call: Person _____ Area _____ No. _____

☐ Notary Fee _____ City _____

☐ Postage _____

☐ Petty Cash _____

☐ Photo Copy: Number _____

Date 3/2-3/3/09 Amount \$ 2300

Explanation

cash

*Tips - hotel clerk
airport parking*

By RTM

COST VOUCHER ROSEMONT FORMS, INC. P.O. BOX 262, PETERSBURG, PA 16669

Client UAW / Reesi File # 14824

☐ Office Expense

Check One

☐ Phone Call: Person _____ Area _____ No. _____

☐ Notary Fee _____

☐ Postage _____ City _____

☐ Petty Cash _____

☐ Photo Copy: Number _____

Date 3/23/09 Amount \$ 30.00

Explanation cash no receipt airport shuttle

By RDM

COST VOUCHER

© ROSEMONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 16669

Client Walt Reese File # CC☐ Office Expense

Check One *

☐ Phone Call: Person _____ Area _____ No. _____☐ Notary Fee☐ Postage City _____☐ Petty Cash☐ Photo Copy: Number _____Date 3-2-3-3-09 Amount \$ 24.00Explanation airport parkingBy Rsm

Sale

03/02/09
 Merchant ID: 000410544189
 Track ID: 1200
 03/02/09
 Batch#: 000001
 Retrieval Ref #: 00041046

MASTERCARD Entry Method: Swiped

XXXXXXXXXX9025

Appr Code: 025936

Inv #: 000050

Total: \$ 24.00

Customer Copy

COST VOUCHER

© ROSEMONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 16669

Client W. J. Reese File # CC☐ Office Expense

Check One

☐ Phone Call: Person _____ Area _____ No. _____☐ Notary Fee City _____☐ Postage☐ Petty Cash☐ Photo Copy: Number _____Date 3.3.09Amount \$ 15.00

Explanation

baggage feeBy RJM

PASSENGER RECEIPT 01

03MAR09 0066 US

DL/KI

CVG FTO

EXCESS BAGGAGE
TICKET

ROGER J/MCCLOW

NOT VALID FOR

**TRANSPORTATION*

PSGR TICKET 0127409061733

THIS IS YOUR RECEIPT

CVG DL DTW

PIECE 15.00

EBC 15.00

29DB81 /DL

FOR CONDITIONS OF
CONTRACT - SEE
PASSENGER TICKET AND
BAGGAGE CHECK

USD 15.00

XXXXXXXXXXXXXXXX9025/037766

NOT VALID FOR TRAVEL

0 006 2602363826 2

0 006 2602363826

USD15.00

COST VOUCHER

© ROSEMONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 16669

Client WAW/Leise File # CC☐ Office Expense

Check One

☐ Phone Call: Person _____ Area _____ No. _____☐ Notary Fee City _____☐ Postage _____☐ Petty Cash _____☐ Photo Copy: Number _____Date 3.2.09Amount \$ 15.00

Explanation

baggage feeBy RJM

PASSENGER RECEIPT

02MAR09 0066

DL/KI

DTW FTO

EXCESS BAGGAGE
TICKET

ROGERJ/MCCLOW

NOT VALID FOR

**TRANSPORTATION*

PSGR TICKET 0127409061733

THIS IS YOUR RECEIPT

DTW DL CVG

PIECE 15.00

FEE 15.00

290881 /DL

FOR CONDITIONS OF
CONTRACT - SEE
PASSENGER TICKET AND
BAGGAGE CHECK

USD 15.00

XXXXXXXXXXXX9025 051834

NOT VALID FOR TRAVEL

0 006 2602554997 3

0 006 2602554997

USD 15.00

**Bank of America
Cash Rewards
for Business
Cardholder Statement**

Credit Limit	Billing Date	01-08-10
Cash Limit	Days in Billing Cycle	31
Cash Advance Bala	Payment Due Date	02-02-10
Available Credit	Minimum Payment Due	\$10.00
New Balance		

Business Card News
YOUR FINANCE CHARGES IN 2009 WERE \$ 75.01

ROGER J MCCLOW
400 GALLERIA OFC CTR STE 117

Account Number:

IAN 14 2010

Page 1 of 1

CARDHOLDER ACTIVITY

Posting Date	Sale Date	Category	Reference Number	Transactions	Amount
2-23	12-23		55432869357000464206449	BARNES&NOBLE*BOOKQUEST 866-257-7723 NJ	31.65
2-23	12-23		55432869357000464244317	BARNES&NOBLE*BOOKQUEST 866-257-7723 NJ	12.93

1/20/2010 Rec'd
books

Customer Ser: 100.673.1044, www.bankofa

Outside the U: 109.353.6656, For Lost or S: 100.673.1044, Send Billing I: BANK OF AMI, PO BOX 15184, WILMINGTON

COST VOUCHER ROBERSON FORMS, INC., P.O. BOX 282, PETERSBURG, VA 23104

Client: Wash/Rec/Rec File # _____

☐ Office Expense

Check One:

☐ Phone Calls Person _____ Area _____ No. _____

☐ Notary Fee City _____

☐ Postage

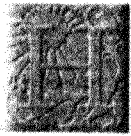
☐ Petty Cash

☐ Photo Copy: Number _____

Date: 12/21/09 Amount: 44.68

Explanation: 2 books on HMO's
ROM

HIGHLAND



ASSOCIATES

Highland & Associates, Inc.

22360 Garrison
Dearborn, MI 48124**Invoice**

Date	Invoice #
8/5/2010	6685

Bill ToCarol Corneille
Klimsit, McKnight, Sale, McCow & Canzano
400 Galleria Officentre, #117
Southfield, MI 48034

P.O. No.	Terms	Project
	Upon receipt	

Description	Qty	Rate	Amount
July 21, 2010 - Reviewed Defendants Motion in Reese, et al v. CNH America, LLC including exhibits 1 thru 5	1.5	150.00	225.00
July 22, 2010 - Meeting at KSM&C offices with R. McCow and S. McKnight to discuss findings and received historical context.	5.5	150.00	825.00
7/22/2010 - Travel Time 36 miles	1	18.00	18.00
7/23/2010 - Review of Indemnity and 1998 plan descriptions. development of Declaration. Meeting at KSMM&C offices	8.5	150.00	1,275.00
7/23/2010 - Travel Time 36 miles	1	18.00	18.00
7/25/2010 - Research, compare 1998 & 2005 Group Health Plans and composition of revised declaration	4.5	150.00	675.00
Travel Time 36 miles	1	18.00	18.00

Billed Aug, 2010

Invoice for Health Care Expert Evaluation and Consulting Services Reese, et al v. CNH America, LLC

Total \$3,054.00**Payments/Credits** \$0.00**Balance Due** \$3,054.008-26-10
PAID
#15892

KLIMIST, McKNIGHT, SALE, McCLOW & CANZANO, P.C.

1589

Highland & Associates, Inc.
Client Costs Advanced

Consultant Fees (billed August, 2010)

8/26/2010

3,054.00

Checking

Invoice #6685

3,054.00

PRODUCT DLT104

USE WITH 91663 ENVELOPE

MCBEE To Reorder: 1-800-662-2331 or www.mcbecoinc.com

PRINTED IN U.S.A.

A

Mass Mailing Costs
December, 2010

<u>UAW J.I. Case - Reese 12-28-10</u>	<u>Amount</u>	<u>Total</u>
Envelopes		
#10 Capitol Bond @ \$.13 ea.		\$ -
#10 White Wove @ \$.08 ea.	2,417	\$ 193.36
Tyvek 9x12 Env @ \$.26 ea.		\$ -
Return #9 @ \$.08 ea.		\$ -
 Postage		
Reg. Sent @ \$.44 ea.	2,417	\$ 1,063.48
Reg. Return @ \$.44 ea.		\$ -
Reg. Sent @ \$.61 ea.		\$ -
Tyvec Sent @ \$.88 ea.		\$ -
		\$ 1,256.84

COST VOUCHER

© ROSEMONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 16669

Client: WAM Reese / OPH File # 1' '86
☐ Office Expense Billed Jan, '11

Check One

☐ Phone Call: Person _____ Area _____ No. _____
☐ Notary Fee City _____
☐ Postage _____
☐ Petty Cash _____
☐ Photo Copy: Number _____

Date 1/18/11 Amount \$ 28.87
 Explanation _____

Reese #10.00 PLUS
37 miles
@ \$.51/mile

By RDH

\$10/-

1/18/11

138

COST VOUCHER

© ROSEMONT FORMS, INC., P.O. BOX 262, PETERSBURG, PA 16669

Client AAA / Reser File # 16 73☐ Office Expense

Check One

☐ Phone Call: Person _____ Area _____ No. _____☐ Notary Fee City _____☐ Postage _____☐ Petty Cash _____☐ Photo Copy: Number _____Date 1/18/11 Amount \$ 8.00

Explanation

Parking @ Fed. Bldg.
Fed. Bldg.By JRC

- CLAIM CHECK -

LIABILITY

Cars parked at owner's risk. Not responsible for articles left in cars at any time or cars left after hours. We reserve privilege of moving cars to other sections of lot.

\$8.00 **07-148**No Attendant After Parking Hours.

Cars will be delivered only on surrender of this check.

TIME IN1:32

Toledo Ticket Co., Toledo, OH